

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

DRAFT CONDITIONAL MAJOR PERMIT NO. F-06-030

Automated Cutting Technologies Inc.

Nicholasville, Kentucky

June 6, 2006

Plant I.D. # 21-113-00036

A.I. #: 80171

Activity #: APE20060001

SOURCE DESCRIPTION:

Automated Cutting Technologies (ACT), located in Nicholasville, Kentucky manufactures wooden store fixtures for the retail industry. The facility is a custom wood products manufacturer, in that its products are made to customer specifications and not mass-produced. The facility consists of woodworking, staining, painting, and topcoat application operations. The emission points include:

EP01 Manual Spray Booth #1 (Stain and Glaze)

EP02 Manual Spray Booth #2 (Primer, Paint, Topcoat)

EP03 Woodworking Operations

APPLICABLE REGULATION:

401 KAR 63:020, Potentially hazardous matter or toxic substances applies to all toxic air emissions.

401 KAR 59:010, New process operations, is applicable.

EMISSION AND OPERATING CAPS:

401 KAR 59:010, Section 3

1. Visible emissions shall not equal or exceed 20% opacity for each applicable process.
2. Particulate matter emissions shall not exceed 2.34 pounds/hour for each applicable process.

401 KAR 63:020, Section 3

The permittee shall not allow any affected facility to emit potentially hazardous matter or toxic substances in such quantities or duration as to be harmful to the health and welfare of humans, animals and plants.

Conditional Major Limitations

Automated Cutting Technologies (ACT), has requested voluntary permit limits of less than 90.0 tons per year of volatile organic compounds (VOC), 9.0 tons per year of individual hazardous air pollutant (HAP) and 22.5 tons per year of combined HAPs.

Type of control and efficiency:

Each Manual Spray Booth has a polyester filter to control particulate emissions with 90% collection efficiency. The spray guns are assumed to have 65% transfer efficiency. There are no controls currently present at the source for VOC and HAP emissions.

The woodworking equipment are connected either to a Dust Technologies or Powermatic portable dust collecting system to control particulate emissions. The source could not determine a control

efficiency for both units and requested DAQ to use a worse case control efficiency of 80% for both units.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.